

THE BAYARD FIRM  
ATTORNEYS

222 DELAWARE AVENUE, SUITE 900

P.O. BOX 25130

WILMINGTON, DE 19899

ZIP CODE FOR DELIVERIES: 19801

III MERITAS LAW FIRMS WORLDWIDE

www.bayardfirm.com

302-655-5000

(FAX) 302-658-6395

WRITER'S DIRECT ACCESS

(302) 429-4208

rkirk@bayardfirm.com

FILED ELECTRONICALLY  
ORIGINAL BY HAND

April 24, 2006

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
844 North King Street  
Wilmington, DE 19801

RE: *LG.Philips LCD Co., Ltd. v. Tatung Company of Amercia, et al.*  
C.A. No. 05-292-JJF

Dear Judge Farnan:

In addition to the issues raised in Mr. King's letter of today's date, Plaintiff would like to address at tomorrow's hearing the remaining fact and expert discovery deadlines for this case.

Enclosed is a proposed order setting forth Plaintiff's proposed deadlines. We have discussed this proposed schedule with Defendants' counsel, but have been unable to reach an agreement. Therefore, we seek the Court's assistance.

Respectfully submitted,

/s/ Richard D. Kirk (rk0922)

RDK/slh

cc: Clerk of the Court (by hand)  
All counsel as shown on the attached certificate

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY; TATUNG COMPANY  
OF AMERICA, INC.; CHUNGHWA PICTURE  
TUBES, LTD.; AND VIEWSONIC  
CORPORATION,

Defendants.

Civil Action No. 05-292 (JJF)

**PROPOSED ORDER SETTING DISCOVERY DEADLINES**

The Court having issued a Joint Rule 16 Scheduling Order on December 21, 2005, and the Court having concluded that certain deadlines in the Joint Rule 16 Scheduling Order need to be reset, IT IS ORDERED that:

1. Depositions may commence on or after May 1, 2006. Fact depositions and Rule 30(b)(6) depositions must be completed by May 19, 2006.
2. Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) relating to each parties burden of proof are due by May 26, 2006; all rebuttal expert reports are due by June 2, 2006.
3. Any party desiring to depose an expert witness shall notice and complete said deposition no later than June 13, 2006, unless otherwise agreed in writing by the parties or ordered by the Court.

4. The Joint Rule 16 Scheduling Order continues to govern in all other respects.

---

DATE

---

UNITED STATES DISTRICT JUDGE

### **CERTIFICATE OF SERVICE**

The undersigned counsel certifies that, on April 24, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Robert W. Whetzel, Esq.  
Matthew W. King, Esq.  
Richards, Layton & Finger  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899

The undersigned counsel further certifies that copies of the foregoing document were sent on April 24, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

Christine A. Dudzik, Esq.  
Thomas W. Jenkins, Esq.  
Howrey LLP  
321 North Clark Street  
Suite 3400  
Chicago, IL 60610

Teresa M. Corbin, Esq.  
Glenn W. Rhodes, Esq.  
Howrey LLP  
525 Market Street  
Suite 3600  
San Francisco, CA 94105

/s/ Richard D. Kirk (rk0922)  
Richard D. Kirk